

ATTACHMENT

A

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

RACHAEL MANEY,

Plaintiff,

v.

MASON PREPARATORY SCHOOL,

Defendant.

Civil Action No. 2:19-cv-02899-BHH

DEFENDANT’S OFFER OF JUDGMENT PURSUANT TO RULE 68

Defendant Mason Preparatory School (“Defendant”) hereby offers to allow entry of judgment to be taken against it pursuant to Rule 68 of the Federal Rules of Civil Procedure as follows:

(1) entry of a judgment in favor of Plaintiff Rachael Maney (“Plaintiff”) and against Defendant in the sum of \$1,000,000.00 with the result that the total judgment amount which Defendant shall be obligated to pay shall be \$1,000,000.00. This shall be the total amount to be paid by Defendant on account of all liability claimed in this action, including all costs of suit and attorneys’ fees otherwise recoverable in this action by Plaintiff.

(2) As an additional element of this offer of judgment, Defendant incorporates the additional terms set forth in the in the executed settlement agreement between the parties.

Dated: November 4, 2021

Respectfully submitted,

/s/ Amy L. Gaffney

Amy L. Gaffney

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